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DEPARTMENT OF CONSERVATION  
STATE OF CALIFORNIA

February 27, 2003

DIVISION OF  
LAND RESOURCE  
PROTECTION

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Ms. Gwen Knittweis  
North Delta Project Manager  
California Department of Water Resources  
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State Clearinghouse  
Office of Planning and Research  
1400 10<sup>th</sup> Street  
Sacramento, CA 95814

Subject: SCH# 2003012112 - Notice of Intent to Prepare an  
Environmental Impact Statement/Report for the North Delta  
Improvements Project

Dear Ms. Knittweis:

California Department of Conservation's (Department) Division of Land Resource Protection (DLRP) staff have reviewed the above-cited document. The Department of Water Resources (DWR) and the U.S. Army Corps of Engineers (Corps) are co-lead agencies in the preparation of an environmental impact statement/report for the implementation of flood control improvements in the northern Sacramento-San Joaquin Delta. These improvements would benefit aquatic and terrestrial habitats while alleviating flood-related problems. The Point Pleasant area, McCormack-Williamson Tract, Dead Horse Island, New Hope Tract, Brack and Canal Ranch Tracts and the Franklin Pond area have recent histories of levee failure and overtopping due to insufficient channel capacities.


The Alternatives section briefly describes six concepts that are being considered for implementation. We ask that the draft environmental document address the following comments:

- We recommend that the Department's DLRP's Land Evaluation and Site Assessment (LESA) model be used for each project alternative to ensure that potentially significant effects on the environment of agricultural land conversions are quantitatively and consistently considered in the environmental review process (Public Resources Code section 21095).

- Additionally, mitigation measures must be considered when there is an apparent impact to agricultural resources, and these mitigation measures must be consistent those identified in the CALFED Record of Decision (ROD), as appropriate for the plans and projects identified. The Division has compiled an annotated listing of approximately 30 "conservation tools" that have been used to conserve or mitigate project impacts on agricultural land. This compilation report is available upon request.
- The NOP indicates that DWR and the Corps will incorporate project elements into the EIS/R that support six CALFED objectives, one of which includes minimizing the conversion of prime, statewide-important and unique farmlands to NDIP uses. The EIS/R should provide a thorough discussion describing how this objective will be met when discussing each alternative. The document should note the location and quality of agricultural lands that may have already been acquired to support the project, as well as any additional agricultural lands to be acquired in the future. Also, potential locations for any less-than-fee-title acquisitions, such as habitat easement acquisitions which preclude agricultural uses should be identified.

We are available to assist the lead agencies in assuring that the environmental documentation prepared for these projects addresses the Division's concerns. Please send a copy of the draft environmental document when it becomes available for review. Thank you for the opportunity to review this NOP. Please contact Jeannie Blakeslee, Staff Environmental Scientist at (916) 323-4943 if you have any questions.

Sincerely,

  
Dennis J. O'Bryant, Manager  
Williamson Act Program